

December 16, 1998

FIELD(Mr/Ms) FIELD(ContactFirstName) FIELD(ContactLastName)
FIELD(Headquarters)
FIELD(Street_Address)
FIELD(PO_Box)
FIELD(City), FIELD(State) FIELD(Zip)

Dear FIELD(Mr/Ms) FIELD(ContactLastName):

The U. S. Environmental Protection Agency (EPA) is conducting a survey to collect information on sources and quantities of hazardous air pollutant (HAP) emissions and control techniques from engine test facilities. The survey information will be used to set national emission standards for hazardous air pollutants for engine test facilities under the authority of Section 112 of the Clean Air Act (CAA). The engine test facilities source category includes any facility engaged in the testing of uninstalled stationary and mobile engines, including turbines and reciprocating engines (excluding rocket motor/engine testing). Testing purposes include determining conformity with applicable standards and/or new product testing. The standards are scheduled to be promulgated by November 2000. You have been identified to receive a survey because information available to EPA indicates that your facility conducts operations that would fall within the engine test facilities source category. Your assistance in providing information is critical in developing a regulation that is realistic and reasonable, as well as protective of the environment.

Enclosure 1 is the engine test facilities questionnaire including the information we request on engine testing at the FIELD(PlantName) locations in FIELD(States) and facilities in any other States conducting engine testing on uninstalled engines. The EPA will use your response to the questionnaire, in conjunction with analogous information collected from other facilities, to quantify HAP emissions; identify the current status of emission control; and assess environmental, energy, and economic impacts associated with installing and operating feasible emission control techniques. The information needed for regulatory development is contained in the information collection form approved by the Office of Management and Budget (OMB No. 2060-0239). We are sensitive to the amount of labor required to respond to this request; therefore, to minimize demands on your time, information specific to engine testing has been extracted from OMB form No. 2060-0239 and formatted to make it more relevant to this industry. The EPA consulted industry representatives from facilities conducting engine testing and trade organizations, and

their comments improved the instructions for this survey as well as its overall focus. Enclosure 1 is the reformatted version of the OMB approved form. The original OMB approved form is available upon request.

We have also provided, as attachments to the survey, additional information on the background and purpose of the survey containing a more detailed explanation of each question. Please refer to this material in completing your response. Please also note that the format of Enclosure 1 is intended to be used as a guide for your response. Any additional comments you wish to provide regarding your response are welcome. You may respond "not applicable" to questions that do not apply to your facility.

Electronic versions of the enclosed questionnaire are available via the Internet at the following Internet web site: www.epa.gov/ttn/uatw/engtest/rock_eng.html. You may complete the questionnaire(s) using the electronic form; however, your response to the questionnaire should be submitted to EPA in hard copy form.

Enclosure 2 contains a summary of the EPA's authority to gather information. This authority is presented in Section 114 of the Clean Air Act, as amended (42 U.S.C. 7414). You should be aware that any failure to comply with this request is a violation of section 114 and as such is subject to enforcement under Section 113 (specifically, Section 113(d)(1)(B) of the CAA, which provides civil penalties of up to \$25,000 per day of violation). If you believe that disclosure of any specific information that you submit would reveal a trade secret, clearly identify such specific information as discussed in the enclosure. Refer to Enclosure 2 for the information the EPA may require, at a later time, to support your confidentiality claims.

Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by the EPA, it may be made available to the public (including industry trade groups) by the EPA without further notice (40 CFR Part 2.203, September 1, 1976). Because Section 114(c) of the Clean Air Act exempts emission data from claims of confidentiality, the emission data you provide may be made available to the public. Enclosure 3 contains a clarification of what the EPA considers to be emission data.

As noted in Enclosure 4, the EPA has designated Midwest Research Institute (MRI) as an authorized representative of the EPA. Therefore, MRI has the rights discussed above and in Enclosure 2. Accordingly, MRI will have access to all information provided to the EPA in response to this request. As a designated representative of the EPA, MRI is subject to the provisions of 42 U.S.C. 7414(c) respecting confidentiality of methods or processes entitled to protection as trade secrets. The MRI contract with EPA is contract number 68-D6-0012.

Enclosure 5 summarizes the EPA and Emission Standards Division policies for handling confidential information and describes the EPA contractor commitments and procedures for using

confidential materials. It is the EPA's policy that compliance by an authorized representative with the requirements detailed in Enclosure 5 provides sufficient protection for the rights of submitters of privileged information.

Enclosure 6 is a form to be completed by recipients of this information collection request who believe that they are not part of the engine test facilities source category. If you believe that your facility received this request for information in error, then you should complete and return Enclosure 6 as soon as possible.

We request that you return the completed information request by March 1, 1999. If you have any questions regarding this request, please contact Mr. Brian Strong of MRI at (919) 851-8181, extension 5472 or by e-mail at bstrong@mriresearch.org or Mr. George Smith of my staff at (919) 541-1549 or by e-mail at smith.georgef@epamail.epa.gov.

Sincerely,

Sally L. Shaver
Director
Emission Standards Division

6 Enclosures

cc: **FIELD**(StateContact1)
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